

From: [Cea Higgins](#)
To: [Gary Helfrich](#)
Subject: re: Aquaculture: Goal C-AR-7, Objective C-AR-7.1, Policy C-AR-7a&b
Date: Saturday, July 24, 2021 5:24:29 PM
Attachments: [image002.png](#)
[image003.png](#)
[Aquaculture-Principles-Public-20210604.pdf](#)

EXTERNAL

Hello Gary,

I have previously commented on the new aquaculture goals, policies, and objectives and wanted to re-emphasize that inclusion of aquaculture in the revised draft should address the potential impacts unique to this type of cultivation, limit areas where land & ocean based operations can occur (i.e. ESHA, ABS, archeological or historic resources...), be consistent with state permitting guidelines, and include provisions to reduce environmental impacts or prohibit certain types of destructive practices and operations.

Aquacultural activities, like any other type of “farming”, have an effect on the surrounding ecosystems with numerous environmental impacts currently associated with its operations and practices such as but not limited to pollution from solid waste and effluent by-products, pesticide and antibiotic residues, introductions of species to non-native environments, and transmission of disease between individual organisms and to other species. In addition, as aquaculture is “ocean dependent” it presents impacts separate and unique to other agricultural practices.

The current proposed LCP language that proposes that aquaculture be regulated in the same manner as agriculture may be “consistent” with the General Plan but as well understood, Local Coastal Plan policies on aquaculture must also adhere to the Coastal Act, state aquaculture permitting guidelines, and be informed by best available science.

I have attached and included a link to the Ocean Protection Council “Guiding Principles for Sustainable Marine Aquaculture in California” so it can be of use in revising the proposed LCP language below to be more comprehensive, science-based, considerate of environmental impacts, and consistent with state and Federal aquaculture policies.

[Aquaculture-Principles-Public-20210604.pdf \(ca.gov\)](#)

Aquaculture:

Goal C-AR-7: Provide for the raising, harvesting and production of fish in the same manner as

the harvesting and production of agricultural products.

Objective C-AR-7.1: Allow aquaculture and its related facilities and activities in agricultural areas.

Objective C-AR-7.2: Provide opportunities for development of support facilities for the fishing industry on appropriate lands.

Objective C-AR-7.3: Promote products of the fishing industry in the same manner as agricultural products.

Policy C-AR-7a: Outdoor aquaculture shall be permitted in the same manner as other agricultural production uses. (GP2020)

Policy C-AR-7b: Support facilities for the fishing industry, including but not limited to equipment storage, processing facilities, and canneries may be allowed on lands designated for agricultural land use adjacent to the Urban Service Boundary of Bodega Bay. If the facility or use requires urban services, extension of such services on lands adjacent to the Urban Service Boundary may only be permitted for that purpose. Ensure that such uses are clearly subordinate to on-site aquaculture production and do not adversely affect agricultural production in the area.

The following criteria shall be used for approval of aquaculture processing or service uses:

(1) The use is subordinate to on-site aquaculture and agriculture production based on the following considerations:

- a. The portion of the site devoted to the support use in relation to production.
- b. The size and number of structures needed for the support use in relation to production.
- c. The relative number of employees devoted to the support use in comparison to that needed for production.
- d. The uses on the site in the past and present.
- e. The potential for the support use to be converted to non-agricultural uses due to its location and access.

(2) The use would not convert agricultural lands inconsistent with Coastal Act Sections 30241 and 30242.

(3) The use does not substantially detract from agricultural production on-site.

(4) The use does not create a concentration of commercial uses in the immediate area.

(5) The use is compatible with and does not adversely impact surrounding residential neighborhoods. (New)

Kind Regards,

Cea Higgins

Advocacy Coordinator

Coastwalk/California Coastal Trail Association



707 829 6689 office

707 217 9741 cell

Cea@coastwalk.org

www.coastwalk.org



Coastwalk believes that through stewardship of the California Coast, people find a balance between their profound need to experience the coast and the need to preserve its fragile environment. We are a grassroots non-profit organization that inspires, educates, and advocates for both coastal protection and responsible public access. We create a community of coastal stewards through our unique guided coastal hiking experiences, providing Trail information, and our work to complete and sustain the California Coastal Trail.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Dawnine Dyer](#)
To: [PRMD-LCP-Update](#)
Subject: Objections to new restrictions on short term rental at the Sea Ranch
Date: Sunday, July 25, 2021 6:58:42 PM

EXTERNAL

> As owners of a home at The Sea Ranch we write to oppose restrictions by Sonoma County on short term rentals, including restrictions on the number of days a home can be rented, and on restrictions as to distance between rental units.

> While the whole world grapples with the impacts of VRBO and other online short term rental apps, this is a different subject. We have rented our house through the same local agency for 25 years and value their knowledge of the unique resources of TSR and their ability to inform renters of their responsibilities as renters. The nuisance ordinances already in place at TSR are sufficient, and we understand Sea Ranch security feels they have sufficient control over the infrequent incidents of noise, and so on. Nuisance control should be at a neighborhood level, rather than a County issue. The TSRA Board has not done any studies that justify their recommendations, which their own Task Force did not support.

>

> We became Sea Ranch home owners, only after benefitting from short term rentals. which serve as an introduction the the area, while providing a revenue stream to the County from taxes collected.

>

> We support the performance standards as per the revised Sonoma County Coastal Plan.

>

> Submitted by:

> Bill and Dawnine Dyer

> 37977 Sentinel Close

> Unit 21 Lot 149, The Sea Ranch

Sent from my iPad

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

From: [Cea Higgins](#)
To: [Gary Helfrich](#)
Subject: re: Aquaculture: Goal C-AR-7, Objective C-AR-7.1, Policy C-AR-7a&b
Date: Saturday, July 24, 2021 5:24:29 PM
Attachments: [image002.png](#)
[image003.png](#)
[Aquaculture-Principles-Public-20210604.pdf](#)

EXTERNAL

Hello Gary,

I have previously commented on the new aquaculture goals, policies, and objectives and wanted to re-emphasize that inclusion of aquaculture in the revised draft should address the potential impacts unique to this type of cultivation, limit areas where land & ocean based operations can occur (i.e. ESHA, ABS, archeological or historic resources...), be consistent with state permitting guidelines, and include provisions to reduce environmental impacts or prohibit certain types of destructive practices and operations.

Aquacultural activities, like any other type of “farming”, have an effect on the surrounding ecosystems with numerous environmental impacts currently associated with its operations and practices such as but not limited to pollution from solid waste and effluent by-products, pesticide and antibiotic residues, introductions of species to non-native environments, and transmission of disease between individual organisms and to other species. In addition, as aquaculture is “ocean dependent” it presents impacts separate and unique to other agricultural practices.

The current proposed LCP language that proposes that aquaculture be regulated in the same manner as agriculture may be “consistent” with the General Plan but as well understood, Local Coastal Plan policies on aquaculture must also adhere to the Coastal Act, state aquaculture permitting guidelines, and be informed by best available science.

I have attached and included a link to the Ocean Protection Council “Guiding Principles for Sustainable Marine Aquaculture in California” so it can be of use in revising the proposed LCP language below to be more comprehensive, science-based, considerate of environmental impacts, and consistent with state and Federal aquaculture policies.

[Aquaculture-Principles-Public-20210604.pdf \(ca.gov\)](#)

Aquaculture:

Goal C-AR-7: Provide for the raising, harvesting and production of fish in the same manner as

the harvesting and production of agricultural products.

Objective C-AR-7.1: Allow aquaculture and its related facilities and activities in agricultural areas.

Objective C-AR-7.2: Provide opportunities for development of support facilities for the fishing industry on appropriate lands.

Objective C-AR-7.3: Promote products of the fishing industry in the same manner as agricultural products.

Policy C-AR-7a: Outdoor aquaculture shall be permitted in the same manner as other agricultural production uses. (GP2020)

Policy C-AR-7b: Support facilities for the fishing industry, including but not limited to equipment storage, processing facilities, and canneries may be allowed on lands designated for agricultural land use adjacent to the Urban Service Boundary of Bodega Bay. If the facility or use requires urban services, extension of such services on lands adjacent to the Urban Service Boundary may only be permitted for that purpose. Ensure that such uses are clearly subordinate to on-site aquaculture production and do not adversely affect agricultural production in the area.

The following criteria shall be used for approval of aquaculture processing or service uses:

(1) The use is subordinate to on-site aquaculture and agriculture production based on the following considerations:

- a. The portion of the site devoted to the support use in relation to production.
- b. The size and number of structures needed for the support use in relation to production.
- c. The relative number of employees devoted to the support use in comparison to that needed for production.
- d. The uses on the site in the past and present.
- e. The potential for the support use to be converted to non-agricultural uses due to its location and access.

(2) The use would not convert agricultural lands inconsistent with Coastal Act Sections 30241 and 30242.

(3) The use does not substantially detract from agricultural production on-site.

(4) The use does not create a concentration of commercial uses in the immediate area.

(5) The use is compatible with and does not adversely impact surrounding residential neighborhoods. (New)

Kind Regards,

Cea Higgins

Advocacy Coordinator

Coastwalk/California Coastal Trail Association



707 829 6689 office

707 217 9741 cell

Cea@coastwalk.org

www.coastwalk.org



Coastwalk believes that through stewardship of the California Coast, people find a balance between their profound need to experience the coast and the need to preserve its fragile environment. We are a grassroots non-profit organization that inspires, educates, and advocates for both coastal protection and responsible public access. We create a community of coastal stewards through our unique guided coastal hiking experiences, providing Trail information, and our work to complete and sustain the California Coastal Trail.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Deborah Eppstein](#)
To: [PRMD-LCP-Update](#)
Subject: Costal Vacation Rentals at Sea Ranch
Date: Saturday, July 24, 2021 9:45:56 PM

EXTERNAL

We have enjoyed renting homes in Sea Ranch for years, and hope that this will not be restricted. Most renters are families looking for a family get-a-way from the Bay Area, and are not large groups of party seekers. Sea Ranch has many internal policies (thus very different from properties in the Russian River area) that are strictly enforced that ensure that the renters do not disturb the community.

Please do not place additional restrictions on rental properties in Sea Ranch as this provides a lovely opportunity for families to enjoy the beautiful North Sonoma Coast, and also brings in good tax revenue to Sonoma County.

Thank you.
Sincerely,
Deborah Eppstein
Sonoma County

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Local Coastal Plan Update Feedback – Coastal MAC

Friday July 23,2021

Introduction

I have been a full-time resident of the Sonoma County Coastal Zone, living in Timber Cove sub-division, since 2013. I am also:

- Owner of both my home and an adjacent vacant parcel;
- Timber Cove Homeowners Association Board member and member of the Architectural sub-committee;
- Previous Board member of Timber Cove County Water District;
- Previous Employee of Timber Cove Resort;
- Independent development consultant.

Prior to moving to Timber Cove, I lived for 14 years on the south coast of Big Sur – living and working within the Monterey County Coastal Zone.

Involvement with the LCP Update

I have been actively involved with the LCP Update process since the September 2019 version was released. I have attended almost all in-person LCP update meetings along the Sonoma Coast and have attended all online focused workshops.

My interest and review of the LCP update relates generally to the Timber Cove section of the document and how it will influence and shape the next 20 years of our community.

Comments

Community Feedback Process

I am an avid supporter of strong community involvement within the planning process of my local community and welcomed the possibility of this with the LCP Update. I have found the actual experience very one-sided and not open to dialogue and consideration of community involvement in decision-making.

There has also been confusion in getting accurate documents to review and work with, as well as unrealistic deadlines to respond to.

Community Economic and Social Well-Being

The Coastal Act declares:

- d) That existing developed uses, and future developments that are carefully planned and developed consistent with the policies of this division, are essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone. (Section 30001)*

The LCP Update fails to fully address the economic and social well-being of the resident communities within the coastal zone. Similarly omitted is an understanding of the needs and impacts of the transient community that live outside of the coastal zone – tourists.

Lack of Depth of Understanding of Community

There is an inherent lack of understanding of the particular characteristics and issues being faced by the different communities within the Coastal zone. The LCP Update does provide very specific data on differences between regions in the Coastal Zone, for example, for natural communities through ESHA maps. However, this same level of attention is not applied to the economic and social factors of the different communities, which would allow for the development of policies that reflect the real issues facing a community on the coast. Similarly, the absence of meaningful data means that a framework for the community for the next 20 years – the duration of this planning document - is either non-existent, or based on incorrect assumptions.

Some examples of this for Timber Cove include:

- Affordable / Workforce Housing (Policy C-LU-5d);
- Application of General Plan policies in the absence of more realistic alternatives (eg. Transportation);
- Education (Page PF-11).

This lack of understanding of real issues is also reflected in the lack of urgency for issues of immediate concern to the community. For example:

- Coastal Permit Process for Fire Abatement (Program C-OSRC-7);
- Ordinance to allow workforce / employee housing (C-LU-2);

The LCP Update also fails to address or support community concerns that occur within the coastal zone, but are the responsibility of other regulatory agencies. Examples include:

- Relevance of Land Use Priorities established by the Coastal Commission (Figure C-LU-1);
- Alternative Septic options.

Local Business

There has been a lack of engagement with the business community within Timber Cove, instead relying on information collected as far back as 1980. The LCP Update sets policies that serve to control the potential for private businesses to expand (or contract). These policies are not based upon any zoning codes or CEQA guidelines, (which any development would need to adhere to), but upon decisions made by authors of the LCP at their own discretion. These private business-directed policies should be removed.

- Policy C-LU-6h: Ocean Cove Store;
- Policy C-LU-6i: Ocean Cove Resort;
- Policy C-LU-6j: Ocean Cove Resort;
- Policy C-LU-6k: Stillwater Cove Ranch;
- Policy C-LU-6l: Timber Cove Inn;
- Policy C-LU-6m: Timber Cove Boat Landing;
- Policy C-LU-6n: Fort Ross Store.

Public Access

There has been no engagement with private landowners regarding designated areas of public access. This has caused inaccuracies in locations, as well as confusion about the ramifications of a point designated as public access to private landowners (Figure C-PA-1e: E9, E10, E11).

Geotechnical Hazard

The California Coast is under increasing threat from impacts of climate change and sea level rise. The current LCP states:

*Prohibit development within 100 feet of a bluff edge or within any area designated unstable to marginally stable on Hazards maps **unless a registered engineering geologist reviews and approves** all grading, site preparation, drainage, leachfield and foundation plans of any proposed building and determines there will be no significant impacts. The engineering geologist report shall contain, at a minimum, the information specified in the Coastal Administrative Manual (LCP III-21, Recommendation 2.)*

The updated LCP revises this to:

Policy C-PS-2i: *Applications for new development or redevelopment on coastal bluff property shall be required to include a site-specific coastal bluff erosion hazards report from a licensed Geotechnical Engineer, Engineering Geologist, or Geophysicist that establishes a geologic setback line for proposed new temporary (e.g., gazebos and portable spas) and permanent (e.g., roads, driveways, water lines, drainage improvements, and septic systems and leachfields) structures and infrastructure. **This setback shall be no less than 100 feet** and shall establish where on the bluff top stability can reasonably be assured for the economic life of the development (no less than 100 years). All new structures for human occupancy and infrastructure located on a bluff top shall be setback to ensure that it will not be endangered by coastal bluff erosion, retreat, and collapse; and thereby avoid the need for shoreline protection devices during the economic life of the development. The effect of any existing shoreline protective devices shall not be factored into the required stability analysis.*

The updated policy introduces a **minimum 100 foot setback**, regardless of the conclusion of an expert analysis for that specific location.

The geotechnical nature of the coastline varies greatly, and given the extreme liability and safety concerns of bluff erosion and stability, a geotechnical analysis prepared by a licensed engineer is an absolute must. However, in setting an arbitrary minimum setback of 100 feet, regardless of expert opinion for the specific site, the LCP Update is disregarding expert findings and potentially deeming vacant parcels undevelopable.

Errors and other Inaccuracies

- Table C-LU-1:
 - Timber Cove Resort, not Lodge;
 - Number of rooms – 46, not 42;
 - All other references to Timber Cove Inn should be Timber Cove Resort.
- Page OSRC-4: Community specific guidelines – inconsistent with Policies C-OSRC – 4b and 4f;
- Table C-PF-1: Characteristics of Public Water Systems:
 - Timber Cove Inn: # connections / lots served – 3 -- what does this mean?

From: [Mary Hansell](#)
To: [PRMD-LCP-Update](#)
Cc: [Carl Serrato](#)
Subject: Short Term Rentals at The Sea Ranch
Date: Sunday, July 25, 2021 7:10:00 PM

EXTERNAL

To Sonoma County Planning Department:

Our family closed the purchase on a home at Sea Ranch on June 1, 2021. We bought a four bedroom house on Cormorant Close, Sea Ranch with the intention of upgrading the property and continuing it as a part-time vacation rental. This afternoon, we became aware of the issue being considered by Sonoma County Supervisors tomorrow related to short term rental regulation at The Sea Ranch. We have read quickly over the past couple of hours and are concerned about restrictions being proposed, in particular concerning maximum nights of rental per year, maximum occupancy of 8 persons and minimum distance of 300 feet between short term rental properties. We made the purchase contingent on the financial plan to bring in rental income; the house was rented to up to 10 people for over twenty years and a large, older vacation rental is positioned next door. You can see the problems we would face.

In addition, we came to know and love The Sea Ranch through our own stays as short term renters. Please do not reduce access to short term rentals at The Sea Ranch.

Sincerely,

Mary J Hansell Carl A Serrato
mjhansell@yahoo.com
t. 650-430-6483

serratoca@gmail.com
t. 650- 576-5139

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Bryce G. Hoffman](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Cc: [Lynda Hopkins](#); nmoran@tsra.org; csjaap@gmail.com; snevin@tsra.org; mkleeman@tsra.org; maggiecc@protonmail.com; karen@amiel-phillips.com; malonsomartinez@tsra.org
Subject: Short-Term Rental Regulation
Date: Sunday, July 25, 2021 5:28:50 PM

EXTERNAL

Dear commissioners and county staff,

I am a resident of The Sea Ranch, and I am writing to you today to urge you to act to protect our coastal communities and their residents from the continued harm caused by the unregulated and unrestricted short-term rental industry.

As someone who grew up on the North Coast, I can tell you that the entry of Airbnb, Vacasa, and other technology-driven corporations has fundamentally altered the short-term rental business in this area, dramatically increasing the number of guests, reducing the length of the average stay, and increasing the amount of time units enrolled in these programs are occupied by tourists. This has had a significant, deleterious impact on the quality of life of those of us who live in neighborhoods with a high density of short-term rental properties.

More than 40 percent of the homes in the neighborhood I live in at The Sea Ranch are now enrolled in these short-term rental programs. While many of their guests are respectful of our community's rules and the laws of Sonoma County, many are not. Over the past year, we have had to contend with midnight parties that left beer cans strewn across the lawn, off-leash dogs chasing fauns, guests driving their vehicles through tall grass during the height of fire season, multiple instances of trespassing, and other challenges to our right to the quiet enjoyment of our property. Worse still, some of these rental properties continued to operate through the spring and summer of 2020 in open defiance of Sonoma County's public health orders.

And the problem is only getting worse.

Because our coastal communities lag behind other so-called "destination areas" in California when it comes to enacting commons-sense restrictions on these businesses, more investors are purchasing property here to grow their rental property portfolios because they can no longer do so elsewhere. At the same time, as communities from Palm Springs to Lake Tahoe to our own Russian River move to limit short-term rentals, more short-term renters find themselves directed to our communities.

All of this directly threatens the residential character of our communities, while at the same time making a mockery of our zoning regulations.

Let me give you an example of what I mean by that. In the past week, the rental property next door to my house has hosted three different sets of guests, five visits by housekeeping staff, two visits by spa cleaning staff, and three visits by maintenance staff. That level of activity and traffic is hardly in keeping with the residential zoning of this neighborhood. It is commercial activity, plain and simple. And this is just one property; there are four others on my street with similar levels of activity.

As you are no doubt aware, short-term rentals have become a major – and contentious – issue here at The Sea Ranch, pitting full- and part-time residents and responsible rental owners who understand the need for regulation against a small but vocal minority of short-term rental business owners who are concerned about the impact such regulations might have on their bottom line.

In 2019, The Sea Ranch Association board of directors empaneled a Short-Term Rental Task Force to study the problem and make recommendations. That task force was made up of both full-time residents and part-time rental owners. It held numerous public hearings, both in person and online, and conducted extensive studies of the problem before recommending to our board that it enact comprehensive regulations to restrict the number, density, and occupancy levels of short-term rental properties at The Sea Ranch.

When our board learned that Sonoma County was considering similar restrictions, it wisely decided to subordinate its efforts to those of the county as a whole, rather than pursue a course different from the rest of the county. However, at the request of county officials, our elected representatives drafted Model Rule 6.7 and approved its submission to the county as a potential starting point for the county's own regulations.

This draft rule was the product of the extensive work of our Short-Term Rental Task Force and the many public workshops it conducted in our community on this issue. That it was approved unanimously by our often-divided board is a testament to the strong support it has from residents here at The Sea Ranch.

I recognize that there are some who would try to convince you that this is not the case. After this draft rule was approved and submitted to the county for consideration, some short-term rental business owners organized themselves and launched an aggressive, well-funded misinformation campaign in a desperate bid to prevent the county from acting on this important issue.

It is worth noting that many, if not most, of these folks are absentee property owners who do not live – or vote – in Sonoma County.

While I would never argue against the rights of business owners to conduct their business in accordance with local laws and restrictions, I have a real problem when those business owners insist on the right to do so in a residential area that is not zoned for this high volume of commerce.

The draft regulations approved by our board would still give responsible homeowners ample opportunity to help pay for their second homes with the revenue generated by renting them out. They would also allow The Sea Ranch to continue to offer plenty of accommodations for visitors who want to enjoy the rugged beauty of our North Coast. What they will not do is allow a shadow lodging industry to enjoy unrestricted access to our residential neighborhoods, to continue to erode our quality of life, and to continue to imperil our very sense of community.

I urge you to consider it as a model as you help Sonoma County draft meaningful regulations to prevent that from happening. But more than anything, I urge you to act soon and decisively on this important issue.

Thank you.

Bryce G. Hoffman

brycehoffman.com

104 Anchorage Close, The Sea Ranch

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Carolyn Hsu and Jacquelyn Moorad](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: In Support of Sea Ranch Short Term Rentals
Date: Saturday, July 24, 2021 12:53:05 PM

EXTERNAL

Dear Sonoma County Planning Commission,

We are a gay couple in our 40s who rented at Sea Ranch for long weekends. We were attracted to the area for its sublime beauty, but especially for its reputation for being inclusive to all. At the new member meeting we attended after we bought our house, our then nine month old son sat in the courtyard of the DelMar Center watching the butterflies and hummingbirds, until one of the members holding the meeting asked us to bring him inside, because, as he said, these new children were the future of Sea Ranch. He is now seven, and we have a two year old as well, and we have tried to raise them to be guardians of the land in this magnificent part of the California coast. We have been so grateful for the stewardship and care that TSR has provided, and the incredible community that has always supported us here. We often tell our children that this land does not belong to us, but rather we have the important and incredibly privileged role of keeping it safe and accessible for all to enjoy. While at the SFMOMA exhibit on The Sea Ranch, we were taken by a giant poster that the founding members created which outlined the Sea Ranch Principles in two columns labeled YES and NO. Under the Yes column, there was: Diversity: People, Income, Professions, Interests. And under the No column: Uniformity. Short Term Rentals provide that diversity and accessibility. The California Coast should be open to all, and the access that rentals provide steers us away from individualism and towards a broader sense of collectivism. We fear that limiting Short Term Rentals in The Sea Ranch will restrict access to a diverse group of people, and for that we thoroughly support the Sea Ranch Hosting Coalition's goal of providing access to the Sonoma coast to a broad range of visitors, supporting the local economy, and keeping Sea Ranch accessible to all.

Thank you,
Carolyn Hsu and Jacquelyn Moorad

SEA RANCH PRINCIPLES

YES	NO
Nature predominates (rural matrix)	Vest pocket nature (as at Camel or Bodega)
Rural	Suburban
Communally	Individual houses
Aesthetics (major overall concern for art, architecture, graphics, signs)	Aesthetics (up for grabs)
Design control (AIA etc. awards over the years)	No control (see the butcher of highway 1)
Diversity People Income Profession Interests	Uniformity
Non-elitist	Elitist (Pebble Beach/Carmel)
Moderacy of house size	Enormous houses
Reforestation.	Individual planting
Maintain unique character (North coast)	Relinquish character (any other 2nd home community)
Native trees	Exotics
Preserve access (to coastline and views)	Relinquish access (Malibu type)
Common facilities trails recreation vigorous association playgrounds vegetable gardens activities	Individuals only
Simplicity	Flamboyance

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Shaheen Kazi](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Cc: [Shaheen Kazi](#)
Subject: Keep The Sea Ranch Open to Short-term Rentals
Date: Saturday, July 24, 2021 2:08:09 PM

EXTERNAL

Hello Sonoma County Team,

Several times a month I receive such lovely messages from families who thank us for sharing our home at The Sea Ranch with them. Our home has become their happy place. Our home is used for celebrating birthdays, anniversaries and special occasions, where families can spend time with each other in a beautiful setting over a month, a week or even a long weekend..

I'm a homeowner at The Sea Ranch. We bought our home there as a second home after experiencing the beauty and magic of the place after several weekend stays there as a short-term renter. We've had our home now for 5-years. We spent the first 3+ years fixing it up and updating it to current standards -- all done with permits, of course. While we love coming there and treasure our time there, we're unable to stay there permanently or even come every weekend. Last year, just prior to the pandemic lockdown, we put our home up for short-term rentals, with the idea of sharing the beauty of the place and our home for others to discover and enjoy, just as we had years before. Of course when the lock down began we had to cancel and reschedule any reservations we already had to later in the year when the county and TSRA opened up for STR. Since then we've had a number of guests who stayed at our home, thanked us for sharing our home with them, and given us 5-star reviews. We are very careful about who we rent to and our guests have all been responsible and taken great care of our home. We have house rules in place, which are all followed. These include not only rules within our home, but also when at the Sea Ranch. We inform our guests of TSRA policies on "peaceful enjoyment" of the lovely surroundings, quiet hours after 9pm and no light pollution. Our guests are respectful of these rules and of our neighbors and we've not had a single incident of abuse of the rules.

Our guests have allowed us to offset the sizable expenses of having our second home, We find now that we enjoy our home at the Sea Ranch so much more now as the income from the rentals allows us to maintain the home and keep it in top shape. In fact we find our second home is kept in much better shape than our primary home, because our guests both expect us to maintain it at the highest standards and help us financially to keep it so.

Even prior to putting our home up for vacation rentals, each time we would visit the Sea Ranch, we would find how much more pleasant and livelier the place is with renters hiking and trails and exploring the place. In general on weekdays, the Sea Ranch can feel desolate and lifeless. Weekend renters bring energy, joy and life to the place. They also keep the homes at Sea Ranch safer from predators by being there and occupying otherwise empty homes.

Many of our renters aspire to become future owners of homes at the Sea Ranch, when they can save up or their circumstances allow them to make the purchase. Short-term rentals help democratize access to the Sea Ranch and the beautiful Sonoma coast, which otherwise would not be affordable to them. Is it not more democratic to share beautiful places, rather than keep them exclusively for the wealthy?

We've heard there are moves to limit short-term rentals at the Sea Ranch. This will hurt us, our visitors, all home owners at Sea Ranch, including those who do not rent out their homes, and ultimately will ruin the overall Sea Ranch community and the broader local economy. I do not believe anyone wants that.

We ask you to keep the Sea Ranch an open community for those who want to experience the beauty of the place without having to buy property there. We as home owners who rent commit to self-regulating ourselves and ensuring our guests are screened and follow the rules of the Sea Ranch Community.

Sincerely,

Shaheen Kazi
Sea Ranch Homeowner

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Wendy Krupnick](#)
To: [Gary Helfrich](#)
Cc: [Caitlin Cornwall](#); greg99pole@gmail.com; [Jacquelynne Ocana](#); [Eric Koenigshofer](#); ejklaw@yahoo.com; Kevin.Deas@deasproperties.com
Subject: Local Coastal Plan
Date: Monday, July 26, 2021 8:50:44 AM

EXTERNAL

Dear Mr. Helfrich,

I may not be able to attend this afternoon's hearing so wanted to submit the following comments regarding the Agricultural Element of the draft revised Local Coastal Plan. I'm sorry that we have not had time to create a formal letter; this is a busy time for those of us in agriculture, with many additional challenges this year and many local issues to try to attend to as well. Because this document is so large and so important, a second hearing preceded by active notice to concerned stakeholder groups could be valuable to allow for more public input

Please see the statements below which relate to sections of the draft Ag Element also below.

Thank you for considering our comments.

Wendy Krupnick

Vice President, Community Alliance with Family Farmers, (CAFF), Sonoma County Chapter

Comments on draft LCP, Ag Element:

Statements in bold below in the draft LCP negate the value of production on smaller parcels, which have the MOST potential for production for new farmers/ranchers and can have much higher revenue per acre than larger parcels. **THERE IS NO CORRELATION BETWEEN PARCEL SIZE AND POTENTIAL AGRICULTURAL VIABILITY.** Today's markets value pastured poultry, locally grown vegetables, berries and other crops that are well adapted to the coast and very appropriate for small parcels.

This false assumption is the basis for some other proposed policies that follow. Not sure if **Policy C-AR-4a:** is appropriate or should be changed?

A criteria to add to **Policy C-AR-5c** is availability of adequate long term water supply.

On farmworker housing, how would **Policy C-AR-6a** be monitored to assure homes actually occupied by farm workers? 4 additional homes is a lot!

Sonoma County Local Coastal Plan | Public Review Draft
Agricultural Resources Element Page AR-4

4 AGRICULTURAL RESOURCES POLICIES 4.1

RESIDENTIAL SUBDIVISION POTENTIAL

Complaints about noise, odors, flies, spraying of pesticides, and similar nuisances related to

agricultural practices may discourage and sometimes prevent farmers from managing their operations

in an efficient and economic manner. Large lot sizes can reduce conflicts between agricultural and

non-agricultural land uses by allowing for buffers between the two. The Right to Farm Ordinance (referenced below in Policy C-AR-3c) also reduces the potential for such conflicts by requiring property owners to acknowledge the agricultural use of land in the area. Together with the Land Use Element, the Agricultural Resources Element establishes policies that maintain large parcel sizes in agricultural areas, and support the needs and practices of agriculture as the highest priority in areas designated for agricultural use.

Goals, Objectives, and Policies | Residential Subdivision

Potential GOAL C-AR-1: Maintain the maximum amount of agricultural land in parcel sizes that are large enough to sustain a viable commercial agricultural operation. Objective C-AR-1.1: Avoid the conversion of agricultural lands to residential or non-agricultural commercial uses. Objective C-AR-1.2: In the Land Extensive Agriculture and Diverse Agriculture land use categories, **maintain the largest land area for agricultural use.** Limit the number of cluster lots on any one area to avoid the potential conflicts associated with residential intrusion.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: glenn.n
To: PRMD-LCP-Update
Subject: sea ranch short term rentals
Date: Sunday, July 25, 2021 6:11:14 PM

EXTERNAL

Dear Mr. Gary Helfrich:

I am a homeowner at The Sea Ranch. I rent out my house on a short term basis and want to be able to continue to do so. I visit The Sea Ranch on a yearly basis, and have done so for decades, since the early 1990's. I contribute to the local economy by visiting, shopping, and by hiring a local rental agency to manage my property. I also contributed to the local economy (realtors, architects, designers, construction and supply companies) by building my house.

If not for the short term rental market I would never have been introduced to the area.

I support the position of TSRHC, as they have outlined below.

1.
We support reasonable performance standards -- indeed we already exceed them and have done so for decades. We know badly managed rentals cause problems for neighbors and welcome bringing everyone up to the same bar.
2.
We provide public access to the Sonoma coast to a diverse range of visitors, supporting the local tourism economy and generating tax revenue for the County.
3.
The County of Sonoma **should not support or endorse the TSRA Board's "Model Rule 6.7"** or other restrictions on Short Term Rentals at The Sea Ranch, as mentioned (but **not** proposed) within the **Sonoma County Local Coastal Plan Update Policy Option: Vacation Rentals:**
 - (1) **Limits on the total number of vacation rentals** allowed on The Sea Ranch. This is a blunt instrument not targeted to any demonstrated problem.
 - (2) **Limits on the proximity of vacation rentals to each other** These mean each rental takes away the rights of many owners to also rent their homes
 - (3) **Limits on the number of days a residential unit can be used** as a vacation rental during a given time period.

The County of Sonoma **should not delegate short-term rental performance standards or restrictions on The Sea Ranch to The Sea Ranch Association.**

Please do not restrict our ability to open our homes to others on a short term basis.

Thank you,

Glenn Nakazawa
35011 Crows Nest Drive
The Sea Ranch
408 483 4966

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Tom O'Neil](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Cc: [Liz O'Neil](#)
Subject: Sea Ranch Short-term Rentals
Date: Sunday, July 25, 2021 7:00:23 PM

EXTERNAL

Hello,

We just recently heard the Sonoma County Planning Commission and Board of Supervisors will be considering proposed restrictions on short-term rentals at The Sea Ranch. We are concerned that the process and recommendations were rushed and the voices of those of us at Sea Ranch who rent our homes were not adequately heard. We are concerned that the proposed restrictions would harm us and many others in the community.

We initially rented for many years at Sea Ranch which is why we chose to purchase a home there. We rent out our home on a short-term basis throughout the year. Restrictions on short-term rentals would harm our income, as well as the incomes of many others living in Sea Ranch and the surrounding community who provide services to renting homeowners and renters, including nearby stores and restaurants.

We ask the Sonoma County Planning Commission and Board of Supervisors to reject the proposed restrictions and not delegate the creation of performance standards and restrictions to the TSRA Board.

Thanks very much for your consideration.

Best Regards,

Liz and Tom O'Neil

--

Tom O'Neil
e-mail: tom.p.oneil@gmail.com
cell: 415-637-1250

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Don Rhett](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: Opposition to The Sea Ranch Association Board Model Rule 6.7
Date: Sunday, July 25, 2021 5:03:17 PM

EXTERNAL

We support "The Sea Ranch Hosting Coalition" views which propose "...the introduction of reasonable performance standards, dictating how Short Term Rentals are operated responsibly, as proposed in the revised Sonoma County Local Coastal Plan (LCP, Program C-LU-1)."

We strongly oppose the views of The Sea Ranch Association Board proposed in their "Model Rule 6.7".

Don & Diane Rhett,
The Sea Ranch Home Owners

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [David Ross](#)
To: [PRMD-LCP-Update](#)
Subject: The sea ranch housing coalition
Date: Sunday, July 25, 2021 4:41:53 PM

EXTERNAL

My husband, Mark Housley, and I support the Sea Ranch Housing Coalition statement. We have rented homes at The Sea Ranch for 20 years with 7 of our closest friends. I hope others will have the same opportunity as we did for decades. We now own a house at TSR we dont rent however in the future, as we age, we might want to rent it for financial reasons. We bought with this in mind knowing we could rent it if needed.

Thanks,

David Ross and Mark Housley

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Francisco Saiz](#)
To: [Scott Orr](#); [Chelsea Holup](#); [PRMD-LCP-Update](#); [Scott Hunsperger](#)
Subject: Keep the Sea Ranch Open!
Date: Saturday, July 24, 2021 2:45:04 PM

EXTERNAL

Twenty-five years ago, my wife and I started to bring our young family to Sea Ranch for vacation. We enjoyed the ride from El Dorado Hills (El Dorado County) through the Russian River valley and the coastal run from Jenner to The Sea Ranch. Even to this day we are still in awe of what Sonoma County and Mendocino County offer in terms of visual escape and short term rentals.

In the year 2004, we decided to buy a home in The Sea Ranch. Our realtor from Kennedy Associates knew all about the STRs (Short Term Rental) in The Sea Ranch. As we reviewed possible house choices, our Realtor talked about what homes were good investments in STRs. The STRs were not the primary reason for us to have a second home on the coast. We wanted a vacation place for our young family and to share with friends.

We became empty nesters in 2003. My wife wanted to be closer to her aging Mom in Marin County. We sold our home in El Dorado Hills and Forestville became our next home. Instead of a four hour drive to The Sea Ranch home from El Dorado Hills, our drive to enjoy The Sea Ranch became less than 2 hours.

Yes, we decided to place our Sea Ranch home on STR with Vacasa. We have a high degree of accountability for our Sea Ranch home via Vacasa and us by living rather close to The Sea Ranch. Between Vacasa and us, our second home is maintained at the highest level for our enjoyment and others. Our place in The Sea Ranch is very private and separated from other Sea Ranch homes.

Vacasa didn't operate our STR during the state and county request to shelter in place per health order. Vacasa did a wonderful job communicating their position to us during the pandemic period as to safeguarding their employees, guests, The Sea Ranch community and us.

My wife and I feel that by being in the STR, we are helping to maximize public access to the coast. Summer months are the busiest season for the coast, especially during the weekends and holidays.

Our Sea Ranch home contributes value to the surrounding area by using local companies: Tom's Plumbing, Pacific Woods Glass, Pro-West, Sea Ranch Supply, Baker's Supply, Gualala Building Supply, Trink's, Azul Cafe, Surf Market, Gualala Market, Ranch Cafe, Two Fish, Thai Garden and many others. I do feel that our 2nd home as a STR is a benefit to Northern California as we pay taxes to maintain local schools and health clinics.

The years of 2020 and 2021 were not typical of the normal rental pattern. There were significantly more rental requests as people could not travel out of the USA for other destinations like Hawaii, Canada, Mexico or Europe or even within the US due to pandemic restrictions. People decided to stay home and visit nearby destinations. The future years will probably not be like this and will revert to the normal flow of visitation for the area. The coastal area of Sonoma County and Mendocino County will always be a magnet for people on the move.

With the introduction of The Sea Ranch in 1964, options for vacations in Sonoma Coast has developed gradually into an economy based on tourism and recreation.

Sonoma County should not support or endorse the TSRA restrictions on STR nor should Sonoma County delegate STR performance standards or restrictions on The Sea Ranch to TSRA board. Any restrictions are inconsistent with the long history of STR welcoming visitors from all walks of life.

Frank & Norma Saiz
The Sea Ranch, CA

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: Kyle Spain
To: PRMD-LCP-Update
Subject: Local Coastal Planning Meeting Comments - 7/26/21
Date: Sunday, July 25, 2021 5:37:54 PM

EXTERNAL

To Whom It May Concern,

As an owner of a house in Sea Ranch, which I rent on a short term basis, I am opposed to the current restrictions being suggested by the TSRA (The Sea Ranch Association):

- 1) Restrictions on whether or when I can rent my house.
- 2) There is no proliferation of short term rentals in Sea Ranch (short term rentals have been stable for over 15 years).
- 3) It is not fair or needed for the TSRA to oversee short term rentals to the degree they suggest and charge a yearly fee as well.

Most importantly there has been no analysis of the effects of the proposed restrictions. The TSRA has conducted no study, engaged no consultants, and offers no opinion on the expected impacts of the proposed restrictions.

More control/restrictions by TSRA will not make short term rentals better. They will only make things more complicated for all owners while not fixing "problems" that do not exist in the first place.

Thanks for your time,

Kyle Spain
37067 Schooner Dr.
The Sea Ranch

**THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.**

From: [Eric Staten](#)
To: [PRMD-LCP-Update](#)
Subject: Short Term Rental Regulations - The Sea Ranch - OPPOSE
Date: Sunday, July 25, 2021 9:00:05 PM

EXTERNAL

To whom it may concern:

I am the owner with my husband, Rhodes Klement, of the house at 176 Sounding in The Sea Ranch.

I am writing to express my strong opposition to the proposed rule change that would severely restrict vacation rentals at my property.

I am extremely unhappy with the underhanded and secretive manner in which this item has been brought to the Sonoma County Planning Commission by the Board of TSRA.

TSRA convened a Short Term Rental Task Force to study the issue of short term rentals in TSR and make recommendations to the Board. The Board has chosen to ignore the recommendations of the Task Force, and without the customary and required input from our community, has proposed additional regulations that are so restrictive they will have the effect of prohibiting Short Term Rentals for my property. These recommendations are coming to you without the input and agreement of the community TSRA Board is purported to represent.

My husband and I are not rich; we would not be able to afford owning property in TSR without the benefit of rental income. We list our house with a local agency, Sea Ranch Escape, and have been doing so without complaint from our neighbors since 2018.

I urge you to vote NO on the proposed rule, and send it back to TSRA so that it can go through the necessary and required public process.

Further details on the impact of the proposed regulations, and the shoddy manner in which they have been advanced, can be found [here](#)

Yours sincerely,

Eric Staten
176 Sounding
The Sea Ranch, CA 95497

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Dennis Styne](#)
To: [PRMD-LCP-Update](#)
Subject: Short term rentals at The Sea Ranch
Date: Sunday, July 25, 2021 8:18:39 PM

EXTERNAL

Long ago in the late 70s we fell in love with Sea Ranch by renting a cabin. How delightful to experience Sea Ranch with our small child in spite of having limited financial resources at that time. More recently, 20 years ago, we were able to buy a cabin which were meant to be the least expensive houses in Sea Ranch. We are pleased now to allow another family in our situation (at that time) to rent it at one of the lowest rental prices in Sea Ranch so that others can take advantage of the wonder that we felt so many years ago. We don't understand how anyone can eliminate this experience from future renters by limiting access to Sea Ranch to only those who can afford to buy expensive houses. If you were to eliminate short term rentals the only lodging available will be at the Sea Ranch Lodge which is limited to 19 rooms.

Thank you for your consideration.

Dennis Styne

****CONFIDENTIALITY NOTICE**** This e-mail communication and any attachments are for the sole use of the intended recipient and may contain information that is confidential and privileged under state and federal privacy laws. If you received this e-mail in error, be aware that any unauthorized use, disclosure, copying, or distribution is strictly prohibited. If you received this e-mail in error, please contact the sender immediately and destroy/delete all

copies of this message.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Lynne Teismann](#)
To: [Scott Orr](#)
Cc: [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: Planning Commission Meeting on July 26, 2021
Date: Sunday, July 25, 2021 9:43:00 AM

EXTERNAL

Dear all:

Since the beginning of Sea Ranch there has always been the opportunity for owners to rent their house to others to enjoy the beauty of Sea Ranch and neighboring towns.

There has never been a need for restrictions to this in the past nor is there at this time.

Like any neighborhood there are a few homes that have on occasion had guests that were too noisy. As a result it is that owners responsibility to deal with the issue or if necessary we have our own security that will deal with it.

There is no factual evidence that anything has changed from the past that indicates problems specifically due to guests we invite to enjoy Sea Ranch.

Since we have managed these issues internally there is no need for new governmental policies or enforcement.

It is the responsibility of our community to manage what happens with our rental guests without involving a governmental agency at this time due to the lack of evidence suggesting a significant change is needed.

Our Sea Ranch community as a whole did not ask for this issue to be brought to you but only the board members. They only made this decision WITHOUT the vote from all Sea Ranchers and as a result have not provided you with accurate data.

I do hope you consider these data pieces during your meeting and hope you recommend that the TSRA board work more closely with its members to resolve its own issues as it has for many many years.

Thank you all for the work you do.

Sincerely
Lynne Teismann
(I do welcome guests to stay at my sea ranch home)

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

The Sea Ranch Hosting Coalition

Supplement to Submission to Sonoma County Planning Commission on the Local Coastal Plan

July 26 2021

This supplement to our submission made on 7/16/21 is provided to update the list of supporters making this submission and provide some individual comments we have received on this issue.

Updated supporter list

Listed below are 194 people supporting this submission, mostly Sea Ranch homeowners who rent their homes.

Samir Aboulhouda	Rodger Hogan	Karen Reis
Lisa Amador	Rich Holmer	John Reis
Trini Amador	Wanda Holmer	Sarah Reynolds
Dawn Ambuhl	Hawley Holmes	William (Billy) Riggs
Dan Ambuhl	Marina Hsieh	Karen Robbins
Montgomery Anderson	Carolyn Hsu	Claire Rose
Jon Arneson	Nancy Huff	Nate Rosenthal
Lyle Bentley	Amy Ihde	Ivy Ross
Lisa Bentley	Joseph Jacobs	David Ross
Marc Berg	John Kamola	Elisabeth Ryzen
Robert Blew	Nina Katz	Danette Sadle-Glass
Joanne Bovee	Shaheen Kazi	Frank Saiz
Edwin Bovill	Chris Kenber	Norma Saiz
Mark Briner	Kaethy Kennedy	sanjay Sakhuja
Kathy Britt	Janice Kesterson	Suzanne Samson
Jeannie Brooks	Jon Kesterson	Tamir Scheinok
Keith Brown	Janet MacKinnon	Patricia Scott
Cari Cadwell-Faso	Kevin Heston	Elizabeth Seaton
Charlotte Cardey	Jean Kirsch	Sean SeLegue
Paul Carter	Rhodes Klement	Linda Shaltz

Brian Chae	Wendy Kosanovich	Jennifer Shaw
Willa Chalmers	Nadine Kossick	Henry Shaw
Craig Chalmers	Danette Krueger	Sarah Shere
Pauline Chew	Kimberley Lakes	Benjamin Sloan
Steve Chinchio	Brian Land	Amy Smith
Peter Cole	Julia & Paul Leaver	Gordon Soares
James Cook	Greg Lee	Kyle Spain
Gardner Cook	W. Byron Levy	Phyllis Stanin
Lindsey Couchman	Catherine Levy	Fred Stanin
Anne Coughlin	Claire Lewis	Robert Stark
Shayne Cox	Gregory Li	Eric Staten
Athena Craig	David Lichtman	Rebecca Steffensrud Marshall
Bryan Craig	Damien Lombardo	Dennis Steindorf
James Curley	Jonathan Lowell	Arnold Steinman
Terry Cutler	William Mabry	Susan Steinman
Bill Cutler	Elizabeth Magee	William Stephens
Kelli D	Janet Maineri	John Taylor
Peter DeMarais	Jorge Martinez	Lynne Teismann
Sarah Deweese	Monica Martinez	Beverly Thayer
Chad DeWitt	Donna Martinez	Doug Thompson
Dawn Dolan	Doug Mason	Marilyn Thompson
Mike Doran	John Matthes	Lars Thorsen
John Dynia	Kathy McClelland	Kate Trompetter
Kathleen Elbasani	Philip Mercado	Trina Turk
Kathy Elbasani	Nirmal Merchant	Markus Urstoeger
Deborah Eppstein	Mary Lynn Miller	Antonia Van Becker
Kurt Fuchs	Ann Monette	Cheri Varnum
Kurt Fuchs	Jacquelyn Moorad	Magesh Venkat
Kevin Fukuda	Michael Morgan	Robert Vincent
Bob Gallagher	Paul Mundy	Nick Vuku
Alicia Ginn	Sibyl Myers	Gideon Wald
Naomi Glass	Erin Myers	Mark Watson

Miju Han	Glenn Nakazawa	Nick Weidenfeld
Eric Hanson	Derek Norman	Sharon Weinstein
Krista Hanson	Randy Otte	Eugene Weiss
Leslie Harbaugh	Peggy Phister	Jill Wennmaker
Gundi Heinemann	Paul Plakos	Vern Wennmaker
Klaus Heinemann	Lynne Potter	Molly White
Karen Helmuth	Kathleen Prati	Cynthia White
Eileen Ho	Pamela Prentiss	Sarah Williams
	Todd Quinn	Clare Winterton
	Louis Rajczi	David Workman
	Gabriel Ramirez	Jay Yan
	Nadya Ramsaroop	Jean Yang
	Corinne Reichel	Judi Yeager
	Brent Reinke	Mitchell Zeemont
		Ralph Zimmermann

Individual comments

"My husband and I live in San Francisco and are in the process of buying a home at sea Ranch. This information about possible restrictions to the short term rentals is quite distressing and will force us to look elsewhere. Please do not add any restrictions." - Kathy Britt

"I rent my home as a short term rental and disagree with any further restriction placed on my ability to share my home with visitors to this fabulous location. It is a part of what allows me to remain a homeowner here." - Steve Chinchio

"I am a sea ranch owner who does not rent out my home, but want the opportunity to do so in future. This is important to me as I'm considering cutting back hours at work and will need another income source. I planned for this scenario when I purchased at sea ranch." - Karen Helmuth

"My wife and I join you all wholeheartedly. We were repeat renters, and then finally bought as part of our long-term retirement plan. Hosting short-term renters is the only way we can afford to keep our Sea Ranch home for retirement." - Wendy Kosanovich

"We are new Sea Ranch second home owners. While I don't rent my home out now, I want the option to remain there in the future." - Kimberly Lakes

"Thank you for this effort. My parents started at Sea Ranch in 1981 through short term rentals and we purchased our current home (which I have inherited) in 1986. It would not have been economically viable for my family without short term rentals, and that remains the case. Eliminating STR will further decrease the diversity of the TSRA ownership community to wealthy Bay Area patrons, a camp my family does not fall into." - Derek Norman

"The ethos of Sea Ranch is about accessibility, not elitism. Access to this coastal community should remain accessible to all and available for short term rentals (by all homeowners) which is the only way many can experience and afford to visit Sea Ranch and this part of the Sonoma coast." - Todd Quinn

"I am a resident of Sonoma County. I want to be able to vacation in my beautiful county by visiting short-term rentals at Sea Ranch and other locations. I am not in favor of increasing restrictions on short-term rentals. By and large, they represent a positive and joyful asset. However, I do appreciate that neighbors can be disturbed by unruly visitors, and this is where restrictions should be directed...not at limiting or eliminating the VR opportunity." - Karen Robbins

"I support the efforts of the Sea Ranch Hosting Coalition to ensure that short-term rentals continue into the future. While rental income was part of our original calculus when we bought our property six years ago, it is not the driving force today. Rather, we benefited as a family as renters long before we decided to buy. And we are so grateful to have the opportunity to let others share our second home and the extraordinary experience of the Sea Ranch, even when they don't have the financial capacity to be owners. If there's one thing I am vehemently opposed to, it is making the community any more exclusive, and any less diverse, than it already is. In fact, I would love to see Sea Ranch be even more inclusive and welcoming to renters and visitors of all types. Let's keep Sea Ranch open!" - Robert Stark

"Without the supplemental income from renting our Sea Ranch home, or if the restrictions are too extensive and prohibitive, we may have to sell. Our family has 5 generations that have spanned our Sea Ranch home ownership and we have always done part time, short term rentals to afford the expenses. We have rented other Sea Ranch homes on a short term basis many times, either because we needed more living space for large family gatherings, or when we were building our second Sea Ranch home after selling the original house that was owned by my wife's parents." - Greg Lee

(The document below is the same as that submitted to Sonoma Planning Commission on 7/16/21 with minor amendments, in red, for clarity)

The Sea Ranch Hosting Coalition

Submission to Sonoma County Local Coastal Plan¹

July 26 2021

Summary

We are a coalition of property owners on The Sea Ranch who welcome renters to our homes responsibly on a short term basis. We provide public access to the Sonoma coast to a diverse range of visitors, supporting the local tourism economy and generating tax revenue for the County. Short term rentals have been part of The Sea Ranch since its founding and their numbers have not changed in the last 15 years [1].

We **support** the introduction of reasonable **performance standards** determining how Short Term Rentals are operated as proposed in the revised Local Coastal Plan (LCP, Program C-LU-1).

We **oppose restrictions on whether and when owners may rent their properties**, as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7" [10]. We present a detailed justification for this position in the attachment. In summary:

- The Sea Ranch is not exclusively a community of full-time residents. 69% of the houses are second homes (2018)[2] -- approximately 20% of houses are used as short term rentals.
- The ability to rent a Sea Ranch home is a valuable asset. Its prohibition requires clear justification. None has been suggested.
- TSRA has done no studies, engaged no consultants and expressed no opinion on the effects of the proposed restrictions. This is irresponsible.
- TSRA's own Short Term Rental Task Force did not recommend restrictions, citing a lack of data, evidence or necessity.
- TSRA's proposed restrictions on Short Term Rentals in the coastal zone are beyond their authority to enact alone. They have not followed the normal process for TSRA rules and are strongly opposed by many TSRA members.
- There has been no proliferation of short term rentals at TSR -- the number has remained stable for more than 15 years.

¹ Minor amendments for clarity to the original submission of 7/16 are shown in red.

- There has been tension between long term residents and renters for many years. Short term rental restrictions will not resolve this and represent a significant overreaction to a minor problem.
- Short Term Rentals make a significant contribution to the local economy and Sonoma County tax revenue. Restrictions would reduce these contributions.
- Increased utilization, if it occurs, is adequately addressed by performance standards.
- Short Term Rentals at The Sea Ranch do not displace affordable long-term rental housing because at current real estate prices, no properties at The Sea Ranch would be available at an affordable long term rent.
- There is no evidence of corporate ownership of rental homes at TSRA and it would not in any case be economically viable.
- The Coastal Commission does not support restrictions on short term rentals unless there is significant proliferation -- none is taking place at the Sea Ranch.
- Nuisance, whether caused by renters, second home owners or permanent residents, is not a significant issue at The Sea Ranch in part because its nuisance ordinances are already stronger than most Short Term Rentals performance standards.

Conclusion

The County of Sonoma should not support or endorse the TSRA Board's Model Rule 6.7 or other restrictions on Short Term Rentals at The Sea Ranch, nor should it delegate short term rental performance standards or restrictions on The Sea Ranch to the TSRA Board.

Such restrictions are inconsistent with the long history of The Sea Ranch welcoming visitors from all walks of life, and with TSRA CC&Rs. They are not supported by many TSRA members, not based on credible studies or facts and are very damaging both to public access and to owners who rent their home on a short term basis.

We support reasonable performance standards -- indeed we already exceed them and have done so for decades. We look forward to working with the County of Sonoma on establishing reasonable short term rental performance standards through the LCP.

Attachment.

DEFINITIONS

Restrictions refers to regulations that would determine **whether** or **when** an owner can rent their home as a short term rental. **Performance standards** prescribe **how** a home may be rented.

Proposed restrictions by TSRA Board members in their "Model Rule 6.7" include:

- A cap on the total number of STR properties at The Sea Ranch
- A maximum of 180 days each year that a home can be rented
- A minimum distance of 300 ft between STR properties

SHORT TERM RENTAL RESTRICTIONS ARE UNNECESSARY FOR THE SEA RANCH

The largest category of TSRA properties is vacant 2nd homes, representing 69% of its housing units (2018 census). The Sea Ranch Association estimates [1, page 7d46] that 365 homes on the Sea Ranch (20% of the total) are Short-Term Rentals and that this percentage has been stable for 15 years. This number is consistent with the number of TOT permits reported by Sonoma County.

There are 1,134 people in 604 households (2018) permanently resident on the Sea Ranch. They are 92.9% white, <1% asian and 6.3% other races, older (median age of 66.1), highly educated (41.4% having a graduate or professional degree) and affluent (mean household income \$116,782) [2,3,4].

Since the large majority of Sea Ranch owners are white and wealthy, short term rentals represent the only realistic path to diversity. Short term rentals are relatively affordable, providing access to Sea Ranch's natural beauty and amenities for people who cannot yet afford to purchase a house.

The Sea Ranch demographics are changing as younger owners, some with children, are now buying, driven by the pandemic and the availability of a state of the art fiber optic network. This has also driven real estate prices up substantially. Over time this may reduce the proportion of permanent residents.

The Sea Ranch has been a popular vacation destination for short term renters since its founding. Many purchasers of Sea Ranch real estate begin as renters. In 2019, The Sea Ranch generated \$1.5 million of Transient Occupancy Tax revenue for Sonoma [1, 7d48] and over \$350,000 in voluntary contribution revenue to The Sea Ranch Association (6% of the Association's budget [5]) directly from short-term rentals.

With its high proportion of vacant second homes, The Sea Ranch is not primarily a residential community. TSRA has misstated the density of STRs at The Sea Ranch: In their report [1, page 7d28] a geographic image of the North 2 region of TSR purporting to show "high" density of STRs shows 20% of the lots² as STRs, slightly more than the long-term historic rate for the Sea Ranch. There are a few isolated streets with higher density, as chance would dictate. The Sea Ranch is not suffering a proliferation of Short Term Rentals, even at the North end.

The California Coastal Commission was established in part to protect public access to the coastal zone. Public access at The Sea Ranch consists mainly of access to affordable Short Term Rental accommodation and thereby access to the trails and coast along with specific public access to certain beaches.

Coastal Commission approval of some Local Coastal Plans that include restrictions on Short Term Rentals has only addressed communities that are different from The Sea Ranch, with higher population density, larger household sizes, more families, proximity to higher education institutions and fewer vacant units [6]. These communities also offer hotel accommodations providing alternative public access.

According to the Coastal Commission, restrictions on Short Term Rentals are appropriate in the Coastal Zone only where proliferation of STRs presents a genuine threat to the character of the community. This is not the case at The Sea Ranch as STRs have always been present at their current levels.

LEASING IS EXPLICITLY ALLOWED IN THE SEA RANCH CC&R's AND is A VALUABLE ASSET TO HOMEOWNERS

The Sea Ranch Common Covenants & Restrictions (CC&Rs) explicitly provide an exception to their restriction to residential use for "the leasing of any lot from time to time by the Owner thereof" [7, 3.02(c)(3)]. Sonoma County also considers short term rental to be a "residential" activity with respect to Zoning ordinances. Removing or restricting this right would have a major impact on Sea Ranch owners who rent their homes and requires compelling justification. This is not provided either in the TSRA STR Task Force report or in Model Rule 6.7.

For many owners, renting their home on a short term basis is the controlling factor in enabling their purchase. It is what makes ownership affordable. For people who do not presently rent their home, the ability to do so is an asset that can protect them in a time of need.

Second generation owners who inherit their Sea Ranch home from their parents may only be able to afford to keep the home if they earn income from short term rentals. Only the very affluent, who can afford to maintain a vacant home during their own absences, will be able to purchase a home that cannot be rented due to the restrictions.

² Across the ranch, 20% of the lots are vacant, so it is more than 20% of the *properties* that are STRs.

Restrictions on short term rentals take this valuable asset away from homeowners. This can have a serious effect on a family's finances, perhaps forcing a sale of the home.

THERE HAS BEEN NO STUDY OF THE PROPOSED RESTRICTIONS

The TSRA Board has conducted no study, engaged no consultants and offered no opinion on the expected impacts of the proposed restrictions, either with respect to the supposed problems they will solve or to the financial impacts on members, the Association and public access to the coast. Specifically, the Board refuses to state whether they expect the restrictions to significantly reduce visitor numbers, despite repeated requests.

By failing to properly study the proposal or properly consult members, the TSRA Board has not acted in good faith. This is not an issue where the county should defer to the TSRA Board's supposed authority or expertise since it lacks either.

TSRA's OWN SHORT TERM RENTAL TASK FORCE DID NOT RECOMMEND RESTRICTIONS

The TSRA Board established a Task Force to consider regulation of Short Term Rentals in the spring of 2019. The Task Force collected data and held several public meetings for member comments and produced a report in December 2020 [1] recommending the introduction of performance standards.

The Task Force explicitly considered the topic of restrictions and concluded that they would **not** include any restrictions in their proposal because:

"(1) Not enough irrefutable data could be collected to support decisive recommendations, and (2) It is unclear if these more restrictive density policies will be necessary. Said differently, the TF hopes its initial set of recommendations will reduce STR problems to the point that some density limitation recommendations are not needed." [1, page 7d26]

(note that in the reference it is clear that "density policies" refers to all the types of restrictions now proposed in Model Rule 6.7)

Restrictions were subsequently added by the Board without further evidence, without study of the consequences, without substantive member consultation and in the face of strong opposition from members.

THE PROPOSALS OF THE TSRA BOARD DO NOT REPRESENT THE VIEWS OF MEMBERS AND ARE BEYOND THE AUTHORITY OF THE TSRA BOARD TO ADVOCATE WITHOUT MEMBER SUPPORT

Model Rule 6.7 has not been published for public comment as is required for a new TSRA Rule, or put to a vote of the members. Most TSRA members are unaware of this proposed rule. Multiple board meetings have produced overwhelming objections from members present.

The TSRA Board has a fiduciary duty to all of its membership. It lacks legal authority to lobby the county or Coastal Commission on behalf the Association on this issue because courts have made clear a HOA cannot limit STRs in the coastal zone and it has neither member support nor credible study to indicate the restrictions are in the interest of the membership³.

THERE IS NO PROLIFERATION OF SHORT TERM RENTAL PROPERTIES AT THE SEA RANCH

The TSRA Board states as justification for their Model Rule 6.7: *As with many living systems, community is difficult to build, and easy to disrupt, even destroy. Sometimes, particular shifts and innovations occur that need fairly quick responses to prevent significant harm from occurring. Such is the case with the rise of online vacation rental platforms. These platforms have supported the commercialization and "hotel-ification" (sic) of residential communities across the nation. In these cases, **uncontrolled and unmanaged growth of STRs** has eroded people's sense of safety and their connection to one another, and risks changing a community's character in perpetuity.*

The TSRA Short Term Rental Task Force itself [1] identified that the number of Short Term Rental properties at The Sea Ranch has been stable at about 20% of properties for at least 15 years.

The Model Rule assumes that "*proliferation of STRs*" is the major cause for action but the evidence shows that there is no growth of STRs at The Sea Ranch. The TSRA Board cites "problems" that may exist elsewhere as justification for their proposed restrictions. These problems have not been demonstrated at The Sea Ranch - which has had hundreds of STRs since its inception and has welcomed generations of a diverse public to share in the beauty of the Sea Ranch.

TENSION BETWEEN HOME OWNING COMMUNITIES ON THE SEA RANCH

There is a long history of tension between Sea Ranch residents and short term renters. During the Coastal Commission building moratorium in the late 1970s, a group of homeowners threatened to take the Commission to the Supreme Court to oppose their demand for public access to Sea Ranch beaches. The 1980 Bane Bill resolved the issue, providing public access to beaches as well as other very substantial changes to the Sea Ranch. These changes

³ Lamden v. La Jolla Shores Clubdominium Homeowners Assn (1999)

included a sharp reduction in the number of lots and the requirement to provide low-cost employee housing on the Sea Ranch.

Some residents object to the presence of short term renters and in particular their utilization of Sea Ranch amenities like the recreation centers. The voluntary contribution of 3.5% of rental revenue to the Sea Ranch by owners who rent, introduced in 1991, was an attempt to solve this problem. (The Sea Ranch as an HOA is not empowered under the Davis/Stirling act to levy taxes). In the recent past, former community manager Frank Bell, in response to a rising tide of complaints from residents, wrote in the Sea Ranch Bulletin that Sea Ranch was not originally designed for permanent residence and short term rentals were always an integral part of the founders' vision, saying that renters have every right to be at the Sea Ranch.

Pressure to restrict short term rentals, evidenced in Model Rule 6.7, may be driven in part by this same dynamic. It is entirely understandable that some of these tensions exist. But long term restrictions on short term rentals proposed by Model Rule 6.7 are not the right way to fix the situation. The Sea Ranch is about to embark on the creation of a long term strategic plan. This is precisely the project within which these and other issues should be resolved.

SHORT TERM RENTALS MAKE A SIGNIFICANT CONTRIBUTION TO THE LOCAL ECONOMY

With conservative assumptions,⁴ an average vacation rental home at The Sea Ranch contributes over \$30,000 per year directly to the local community. Across 365 homes, this is an annual contribution of well over \$10 million. This does not include non-essential improvements owners make to their homes that support local construction businesses. Significantly curtailing this revenue would seriously impact the local economy. There is already a shortage of critical local service providers. Any reduction in short term rentals and the consequent impact on ownership would make an already serious problem worse.

INCREASED UTILIZATION IS ADEQUATELY ADDRESSED BY PERFORMANCE STANDARDS

The Sea Ranch Association Board claims there has been a significant increase in visitors in recent years [1]. Since the number of STR properties is not growing, this could only occur through increased utilization. They infer this increased utilization [1] from a one-off increase in Sonoma TOT revenue between 2017 and 2018, a 14% increase in number of rented nights per unit between 2016 and 2019⁵ and an increase over time in TSRA 3.5% fee revenue (the latter is in line with inflation). This is hardly compelling.

⁴ Average 40 x 3 day stays per home, \$500 guest spending per stay in local businesses, \$2,000/yr additional maintenance paid to local businesses, 3.5% TSR fee, Sea Ranch Connect and Sea Ranch Water company fees

⁵ They include projected 2020 figures data published early in 2020, but this is hardly reliable due to the difficulty of projecting a seasonally varying metric and the COVID-19 pandemic.

Homeowners at Sea Ranch have, over five decades, made their homes available to vacation renters and have demonstrated admirable responsibility in ensuring that renters conform to Sea Ranch standards. Nuisance is caused by both second home and permanent residents as well as renters. There is no evidence that renters cause any more problems than other categories of owners. The Sea Ranch has an outstanding rental performance record.

The Sea Ranch has in place and has recently enhanced nuisance rules (for all members) that are already stronger than most STR performance standards. Where there have been specific issues, TSRA has not enforced the regulations that are already in place. According to TSRA Security there were **20** noise complaints [8] associated with short-term-rentals in 2018 - the year presented with the highest number - and **19** complaints associated with owners and others. This represents one noise complaint per rental home every 18 years. This was *before* the introduction of enhanced nuisance rules which appear to have caused a significant reduction in complaints.

This data suggests the situation is well under control with The Sea Ranch's nuisance rules (Rule 6.6), which are currently being even further enhanced.

SHORT TERM RENTALS DO NOT DISPLACE AFFORDABLE HOUSING AT THE SEA RANCH

The Sea Ranch Association claims [10, 4a9], without evidence, that "*The proliferation of STRs has reduced the stock of housing available for long-term rentals. This has contributed to a housing crisis for moderate income and low income residents with employment in the region.*"

As noted above, there is no proliferation of STRs at The Sea Ranch, but the converse proposition that *reduction* in the number of STRs would *increase* availability of affordable long-term housing at The Sea Ranch is also simply not true.

None of the Sea Ranch homes now in the STR market would become housing options to fill that need, urgent as it is. A current Zillow search shows that no homes are available for sale on the Sea Ranch at less than \$1.1 million. Long-term rentals for these properties will not be "affordable".

The result of Short Term Rental restrictions will not be more affordable housing. It will be more vacant or For Sale homes and a resulting reduction in both house prices [12] and public access to the coast.

CORPORATE OWNERSHIP OF STRs HAS NOT OCCURRED AND IS ECONOMICALLY UNATTRACTIVE

TSRA claims that there is a threat of individual or corporate investors descending on The Sea Ranch to purchase multiple homes for use as STRs. News reports of Marriott's marketing arrangement with Vacasa [13] have been wrongly characterized as such a threat.

This phenomenon has not been observed at The Sea Ranch. The economics of owning and renting an STR property purely for investment at The Sea Ranch are not at all favorable.

Allowing (generously) for \$50,000 gross annual income on a \$1MM property, after subtracting management fees (25%), property tax (~1% of property value), insurance (~\$4k), utilities and maintenance (~\$10k) and HOA fees (\$2.7k) the owner is left with less than \$10k. This is a 1% annual return on a \$1MM investment. This would not fund a loan.

There is no credible case for investor ownership as a threat to TSR.

THE COASTAL COMMISSION FAVORS RESTRICTIONS ONLY IN THE CASE OF PROLIFERATION OF VACATION RENTALS

The California Coastal Commission has stated [14]:

*... the Commission has **not** historically supported blanket vacation rental bans under the Coastal Act, and has found such programs in the past not to be consistent with the Coastal Act. In such cases the Commission has found that vacation rental prohibitions unduly limit public recreational access opportunities inconsistent with the Coastal Act. However, in situations where a community already provides an ample supply of vacation rentals and where **further proliferation of vacation rentals would impair community character or other coastal resources, restrictions may be appropriate**. In any case, we strongly support developing reasonable and balanced regulations that can be tailored to address the specific issues within your community to allow for vacation rentals, while providing appropriate regulation to ensure consistency with applicable laws.*

This is a broad statement applying to the entire California coastal zone. It is appropriate in densely populated communities with families, children, and a robust long-term rental housing community. None of that exists at The Sea Ranch where only 1,134 [2] full time residents reside. Only 38% of the homes here are occupied by owners, 15% are renter occupied, a large majority are "vacant" using Census terminology.

Restrictions on STRs will diminish the availability of affordable vacation accommodations in an important coastal zone and leave the beauty of the northern Sonoma County coast to be enjoyed by a small number (1,134) of entitled property owners.

As noted above, the evidence proves there is no proliferation of STR homes at The Sea Ranch. The proposed restrictions are not *tailored to address specific issues* as the Coastal Commission suggests.

CONCERNS ABOUT VISITOR BEHAVIOR ARE ADEQUATELY ADDRESSED BY PERFORMANCE STANDARDS AND NUISANCE ORDINANCES

Current Sea Ranch owners who rent their properties on the STR market do so in a highly responsible manner. Overwhelmingly, short-term renters fit well into the Sea Ranch environment and cause few community issues. Very occasional nuisances are resolved in the field. Existing regulations on the Sea Ranch are perfectly adequate to deal with occasional challenges -- but they are not being enforced. And these nuisances are not confined to short term renters. The head of Sea Ranch security states that there is no problem resolving the small number of nuisances that arise.

The Board of TSRA argues without evidence, that “*Without reasonable regulation, STRs allow conduct that damages the tranquility, safety, and beauty of coastal communities.*” [8, 4a9]. They claim online vacation platforms are ‘*causing commercialization and “hotel-ification” of residential communities*’.

The Sea Ranch has never been, and is not now, primarily a residential community. The evidence is that there is no proliferation of STRs. The TSRA Board claims that *generic internet marketing* is resulting in an increasing number of visitors who do not evince the same respect for the natural environment and TSR’s strict rules as residents, or specifically Board members, expect. There is no evidence supporting this claim.

The TSRA Board appears to seek a reduction in visitors to the Sea Ranch without evidence or justification.

References

- [1] Report of the Short Term Rental Task Force to The Sea Ranch Association Board on December 12, 2020
(<https://www.tsra.org/wp-content/uploads/2020/12/2020-12-12-TSRA-BOD-Reg-AgendaPkt-0a2-Full-r.pdf>, page 7d1).
- [2] <https://data.census.gov/cedsci/table?q=95497&tid=ACSSST5Y2019.S0601>
- [3] <https://data.census.gov/cedsci/table?q=95497&tid=ACSSST5Y2019.S1101>
- [4] <https://data.census.gov/cedsci/table?q=95497&tid=ACSSST5Y2019.S1901>
- [5] https://www.tsra.org/wp-content/uploads/2019/11/2019-20-Adopted-Budget-TSRA-ID_5336.pdf
- [6] Comments on the Local Coastal Plan update submitted to the Planning Commission by Carmen Estrada, 3/25/2021 ([link](#))
- [7] https://www.tsra.org/the-sea-ranch-restrictions-articles-2-3/#Article_III
- [8] <https://www.tsra.org/wp-content/uploads/2021/06/2021-06-26-TSRA-BOD-Reg-AgendaPkt-0a-Full.pdf>
- [9] TSRA Short Term Rental Task Force presentation 8/20/20, p20
<https://www.tsra.org/wp-content/uploads/2020/08/STRTF-August-8-2020-Meeting-8-24-corrected.pdf>
- [10] <https://www.tsra.org/wp-content/uploads/2021/06/2021-06-26-TSRA-BOD-Reg-AgendaPkt-0a-Full.pdf>, page 4a8
- [11] <https://ecms.newportbeachca.gov/Web/0/doc/2674168/Page1.aspx>
- [12] <https://www.sciencedirect.com/science/article/pii/S0094119021000383>

[13] <https://www.vacasa.com/news/select-vacasa-homes-added-to-homes-villas-marriott-international>

[14] <https://documents.coastal.ca.gov/reports/2018/4/w20a/w20a-4-2018-exhibits.pdf>

From: [Amantha Walden](#)
To: [PRMD-LCP-Update](#)
Subject: OPPOSITION TO TSRA BOARD'S "MODEL RULE 6.7"
Date: Sunday, July 25, 2021 4:25:29 PM

EXTERNAL

To Whom It May Concern:

My husband and I are strong supporters of TSRHC. We bought a home in Sea Ranch in August of 2020 after renting houses there for 12 years. We finally were able to purchase our own place and have been restoring it since with hopes to be able to rent it out in 2022. We are residents of Los Angeles and plan to spend our summers there but were planning to offset costs by offering it as a beautiful, restored rental. These new rules will drastically effect those plans. Please see below as we stand with the TSRHC.

1. **We support reasonable performance standards** -- indeed we already exceed them and have done so for decades.
2. We provide public access to the Sonoma coast to a diverse range of visitors, supporting the local tourism economy and generating tax revenue for the County.
3. The County of Sonoma **should not support or endorse the TSRA Board's "Model Rule 6.7"** or other restrictions on Short Term Rentals at The Sea Ranch, as seen within the [Sonoma County Local Coastal Plan Update Policy Option: Vacation Rentals:](#)
 - (1) **Limits on the total number of vacation rentals** allowed within certain areas (e.g., by neighborhood, by communitywide ratio, etc.).
 - (2) **Limits on the types of housing** that can be used as a vacation rental (e.g., disallowing vacation rentals in affordable housing contexts, etc.).
 - (3) **Limits on maximum vacation rental occupancies.**
 - (4) **Limits on the amount of time a residential unit can be used** as a vacation rental during a given time period.
4. The County of Sonoma **should not delegate short-term rental performance standards or restrictions on The Sea Ranch to the TSRA Board.**
5. We oppose restrictions on whether and when owners may rent their properties

6. Policy Option: Vacation Rentals

We do hope you will reconsider these drastic standards and allow people to continue to rent out their homes in Sea Ranch. It is a thriving rental community and that is a large part of beauty of the Sea Ranch and the original goals set forth.

Sincerely,
Amantha Walden

Sent from me to you.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: [Eugene Weiss](#)
To: [PRMD-LCP-Update](#)
Subject: Sea Ranch Short Term Rental Restrictions
Date: Saturday, July 24, 2021 2:20:28 PM

EXTERNAL

To whom it may concern,

I'm writing to oppose the proposed restrictions on short term rentals at Sea Ranch. I participated in most of the public meetings of the Sea Ranch Short Term Rental Task Force, and I can testify that the proposed restrictions are very far from the consensus views either of the task force members or of the public comments made at the meetings, both of which favored measures to prevent problems at a handful of problem properties, but which otherwise were generally favorable about the impact of short term rentals at Sea Ranch.

The proposed restrictions don't seem to have anything to do with the study conducted, I'm flummoxed as to why the Sea Ranch board of directors endorsed them. I would urge you not to rush these through, but rather to permit time for further study and discussion.

Thanks,

Eugene Weiss

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

From: Susan Zetzer
To: PRMD-LCP-Update
Subject: Sonoma Coast Local Planning Commission July 26 meeting
Date: Sunday, July 25, 2021 8:23:28 PM

EXTERNAL

Hello, Gary

First, thank you for your service on the planning commission. I am a very proud owner of a property in Sea Ranch since 2014 and have had a positive experience renting out my property at 63 Clippers Reach. As I am still working full time, it won't be possible for me to attend the planning commission meeting on July 26; however, I did want to provide input on the TSRA "Model Rule 6.7".

I take my obligations as a property owner and a good neighbor very seriously. This means that I use a very well respected property management company, Beach Rentals in Gualala, to ensure compliance with current guidelines and to handle any issues that could arise. The property has had short term rentals since 2014 and we have not had any complaints or concerns from neighbors. As I am earning modest income from the rentals, I can handle the improvements and repairs that are needed, including the removal of dead and dying trees from my lot that borders a Sonoma county trail and creek and the replanting of native trees and shrubs to protect from erosion, with TSRA approval. (No small financial matter over the last few years). The income allows me to support the RCMS, the volunteer fire department and other local organizations that augment our county services.

For your meeting tomorrow:

- 1) I fully support reasonable and appropriate performance standards.
- 2) I fully support public access to the Sonoma Coast and that is one of the reasons I purchased a home in the Sea Ranch.
- 3) I do not support limitations on the number of rentals or the proximity of rentals to one another. This rule will limit new property owners to those who can afford to buy a property AND do not rely on supplemental income from short term rentals.
- 4) The TSRA is a respected association; however, I do disagree with their approach on the matters relative to short term rentals. The costs associated with monitoring and enforcing their suggested guidelines would be significant both for TSRA members and for Sonoma County. Based on the data provided by TSRA and their studies to date, there are only a very few properties that violate the current guidelines. Enforcement of current guidelines should address the violations and I do not support the new, restrictive guidelines.

Thank you in advance for your consideration of my perspectives on this important matter.

Kind regards,
Susan Zetzer
63 Clippers Reach, Lot 17-0-05
The Sea Ranch
Sonoma County

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



July 23, 2021

Cecily Condon
Sonoma County Permit and Resource Management Department, Planning Division
2550 Ventura Avenue
Santa Rosa, CA 95403

Subject: Sonoma County Draft Local Coastal Program Land Use Plan Update

Dear Ms. Condon:

Thank you for the opportunity to review and comment on the County's proposed update to the Local Coastal Program (LCP) Land Use Plan (LUP). Please provide these comments to the Planning Commission for their initial consideration of this matter (scheduled to be heard at the July 26, 2021 Planning Commission hearing). As you know, the LUP is a key regulatory tool that implements statewide California Coastal Act provisions at the County level to protect, restore, and enhance coastal resources, including by specifying the kinds, locations, and intensities of allowed development and applicable coastal resource protection requirements. Once the LUP and an accompanying Implementation Plan (IP) are certified by the Coastal Commission,¹ thus certifying an updated LCP overall, the updated LCP forms the basis and standard of review for future development within the County.

Accordingly, the County's current LCP update process offers an exciting opportunity to holistically and comprehensively envision and plan for the future of Sonoma County's coastal zone, and to provide a foundation to achieve that future. As you know, we have been actively and directly engaged with you and your staff to help identify issues as early as possible, and to provide recommendations on how to approach the many complicated coastal resource policy decisions facing the County. We have appreciated that collaboration to date, and we commend County staff for your thoughtful efforts on the draft updated LUP. In our experience, this type of early coordination helps to ensure a smoother LCP certification process, including streamlining review and resolution of issues upon submittal to the Coastal Commission for required approval and certification. In that vein, we recognize the hard work the County has invested in developing this draft LUP document and are hopeful that these comments are understood in the manner in which intended; namely to provide as much helpful guidance from our perspective as possible at this juncture, including in response to your specific requests for comments prior to the Planning Commission hearing.

Thus, this letter provides a summary of some of the key issues we've identified in our

¹ The standard of review for an LUP is Chapter 3 of the Coastal Act, and for an IP is the certified LUP.

review of the current draft updated LUP document (provided to us on July 12, 2021), as well as some broad recommendations for how to address these issues. We fully intend to provide more detailed feedback as the LUP update makes it through Planning Commission and Board of Supervisors hearings but wanted to provide at least this initial feedback for now. We hope it is helpful in that process.

Organization

The proposed LUP update clearly provides up-to-date information and important revised policies, but some of its potential effectiveness may be lost due to the current system of organization. Specifically, the policies in the document are organized by topic area, followed by policies categorized as “implementation programs” that are relevant to each of the preceding topic areas. In our view, this policy organization will tend to make the LUP itself potentially confusing and difficult to implement, particularly in relation to the understanding of which policies might apply in each scenario. In our experience, LUPs are clearer and easier to use when policies are organized by general topic areas (e.g., coastal hazards, public views, etc.) rather than sprinkling topical policies throughout each chapter. Once those general topical areas are developed in that way, LUPs can then provide additional detail for case- and/or geographically specific situations that build upon the general framework established, included to provide for any deviations from the general requirements that might be appropriate in any particular case/area. We believe that the draft LUP provides a useful base and starting point for such an organizational structure and would suggest that it be explored.

In addition, the draft LUP includes references to numerous external documents on which the policies rely, without incorporating those documents in full. In our experience cross-references like this can be extremely difficult to manage and understand in an LCP context. For one, there is an argument that these external sources are then made part of the LUP by their explicit reference. If they are intended to govern coastal permitting and planning decisions, that argument is further bolstered. And then there is a counter argument that they are *not* part of the LUP by reference, and thus can be changed outside of an LCP amendment context. Either— and even both in some cases – of these arguments may be applied to any particular case in the future if not clarified in the document now. We would strongly suggest that cross-references are eliminated, and that the relevant substantive requirements be made part of the LUP verbatim. This is the best and clearest way to ensure that the LUP is ‘whole’ and can be applied to future decisions.

Also, the draft LUP does not include applicable and relevant Coastal Act provisions. We have found that it is often helpful for understanding LUP policies when these Coastal Act provisions, and at least the Chapter 3 Sections of the Act, are also made an enforceable part of the LUP. The LUP is required to be read consistent with the Coastal Act, from which it derives its statutory authority, so that connection is always implied, but we have found it less confusing for LUP users when it is stated explicitly within LUPs, and we would recommend that here too.

Lastly, as I’m sure you’re aware and planning to resolve, the draft LUP appears to have

inadvertent typos, and some sentence structure/grammatical issues, that require attention to ensure that the resultant LUP is as clear as possible.

Land Use

The draft updated LUP includes updated and revised land use designations and corresponding zoning districts, but they appear incomplete. For example, there is no recreational zoning associated with the 'Open Space' land use designation; no marine industrial zoning for the 'Commercial', 'Timber', 'Land Extensive' and 'Diverse Agriculture' designations; and visitor serving zoning categories seem to be absent altogether. It appears that these land use designations and zoning districts need to be further fleshed out to ensure that they include all necessary combinations. Also, 'Planned Community' zoning is proposed to be allowed on open space land use designations, which we would suggest may not be appropriate due to the potential for projects of that type to adversely impact coastal resources typically associated with such open space areas. Finally, the 'Land Use Designation' and 'Principally Permitted Uses' figures (on page LU-4) do not have figure numbers, and numbers should be added to ensure implementation clarity.

In terms of principally permitted uses (PPUs), it is important for the County to carefully consider which uses are considered PPUs. And, for purposes of appeal of County CDP decisions to the Commission, the LCP can only identify a single PPU in a zoning district for which County decisions are not appealable under the relevant PPU criterion (i.e., per Coastal Act Section 30603, a CDP decision for any development that does not constitute that single PPU is appealable to the Commission). The single PPU can be a broader use type PPU (e.g., residential in an R-1 district, where a number of different residential projects can be listed as PPUs, meaning there are technically multiple PPUs, but they are all of the residential use type and thus excluded from appeals due to PPUs). If multiple PPU use types are identified for any particular zoning district, then there is no single PPU for purposes of appeal, and CDP decisions for all uses in that zoning category would be appealable to the Commission (unless they are specified as PPUs for some type of internal PPU processing purpose, and explicitly not the single PPU for purposes of CDP appeal to the Commission). We can help provide further guidance on this topic, but it is critically important in terms of potential future CDP appellate processes, and should be clearly thought through with this in mind.

The allowable densities listed in the Urban Residential Areas table (specifically 1-6 units per acre in low density and 6-12 in medium) have been increased from the currently allowable densities (specifically in R-1, 1-4 units are allowed, and in R-2, 5-8 units). The County should provide rationalization for these increased allowable densities, including showing that properties in these categories are capable of supporting such densities without coastal resource impacts. Additionally, any provisions regarding increased densities related to affordable housing (see for example Policy C-LU-5c) must clearly indicate that state density bonus and accessory dwelling unit laws do not supersede the resource protections required by the Coastal Act. We have examples of LCP language from other LCPs that we would be happy to provide on this point.

Finally, the current draft of the LUP's Land Use chapter seems to be missing some key policies that were present in the last draft we reviewed. Such policies include (numbered by reference numbers from prior draft): C-LU-5u, regarding retention of adequate water and sewer for affordable housing units, and C-LU-5dd encouraging development of employer provided affordable housing. The County should clarify whether these omissions were purposeful and if so, what that means for the current land use provisions regarding such affordable housing (e.g., if these concepts are somehow covered elsewhere).

Agriculture

With regards to the proposed updated LUP's Agricultural Resources chapter, it will be important to clarify whether both agricultural zoning districts (i.e., Diverse Agriculture (DA) and Land Extensive Agriculture (LEA)) will be treated the same in terms of allowable uses, conversion, and other requirements. As there are only one set of policies in this chapter, it appears as though the two districts will be handled identically, although this hasn't been directly addressed to date. In terms of conversion policies, proposed policy C-AR-1.1 states: "Avoid the conversion of agricultural lands to residential or non-agricultural commercial uses." The draft LUP should clarify whether this means that no conversions of agricultural land will be permitted. If that is not the case, and some conversions will be permitted, additional policies should be incorporated to this point, including regarding evaluation, and mitigation, consistent with Coastal Act Sections 30241, 30241.5, 30242 and 30243.

Open Space and Resource Conservation

For the Biotic Resource Protections section of the Open Space and Resource Conservation (OSRC) chapter, some important policies were omitted since the last time we reviewed the draft documents. Specifically, all of the following have been omitted: the policy requiring designation of environmentally sensitive habitat areas, as well as requirements to update such designations (this was Objective C-OSRC-6.2); the protections for native plants and trees; encouraging the use of natives and voluntary restoration; the required preservation and restoration of wetlands and marshes; the requirement to promote production of native habitats marine and shoreline (these were policies 6.6-6.10); all the policies regarding development allowed within and near to streams and riparian corridors (in last draft Policies C-OSRC-8m through 8q); and the policy regarding requirements for initial site inventories for wetland species or indicators (Policy C-OSRC-9c in last draft). These may have been inadvertently dropped, but they all provide important guidance and requirements related to coastal resource protection, and we would recommend they (or variations thereto) be added back to the draft document.

In addition, there are many references and cites within the OSRC chapter to other documents that apparently contain important requirements for habitat restoration and monitoring, biological resource assessment requirements, ESHA buffer requirements, wetland delineation guidance, and habitat protection guidelines (such as Appendix E-1 through E-5, respectively), as well as development guidelines for allowable uses within habitats. However, the actual cited documents have not been provided. We will have

further comments on these once we have seen them.

Under the 'Energy Resources Policy, Climate Change' section of the OSRC chapter, the discussion on sea level rise, storm surge, and extreme events has been removed. While this may be redundant to some discussions within the Public Safety chapter, this discussion did provide important context in the OSRC chapter, and the County should consider adding it back in. Relatedly, the last draft contained benchmarks and goals for reduction of greenhouse gas emissions that have also been removed (from the currently numbered Objective C-OSRC-11.4), and we recommend that these too be added back to the draft document.

Finally, as you are well aware, the Sonoma County coastline is an irreplaceable visual resource with limited equals, and it demands LUP protections up to the task of protecting, and enhancing, these viewsheds. Although the draft LUP recognizes these issues, it also could benefit from a closer look to ensure that protections for these visual resources are tightened in the context of all cases. In addition, we would strongly recommend that the LUP include a 'critical viewshed' construct, similar to what is applied to the Big Sur Coast LUP in Monterey County. Namely, in Big Sur, development is not allowed to be *visible* to the naked eye from public viewing areas. While there are some exceptions (e.g., for already developed areas and towns, road-related development, parking areas, etc.), this set of critical viewshed policies has helped to retain that natural rugged viewshed, and we would suggest that it would be a valuable tool here to the goals Sonoma County has currently laid out in the draft document. We would also suggest that complementary policies be developed that are directed at the Highway 1 viewshed in particular, that ensure that any allowed visible development is sited and designed to *avoid* and limit visual impacts, and to *'disappear'* as much as possible. We have all seen the cases when inappropriate development is introduced in a visually stunning landscape, including relatively minor such development (e.g., gates, fences, and similar roadside development) which can have significant direct, as well as cumulative, impacts along this critical corridor, and the LUP needs strict policy requirements to ensure the view is protected, including as it relates to the Highway itself as a defining element of that view. We would very much be interested in a conversation about possible policies and related tools that can take coastal zone view protection to a higher level; the Sonoma County coast deserves no less.

Public Access

In terms of policies in the Public Access chapter, we are concerned that as drafted there could be a loss of free public access parking in public rights-of-ways and parking areas otherwise. As you well know, parking along the coast is critical to the ability of the public to access and enjoy the County's coastal zone, including because it is often the only way that coastal visitors can enjoy these areas due to their remote nature. This type of parking is limited, and it is critical it be retained so that visitors not lucky enough to live near the shoreline, including of course other County residents from more inland areas, are also allowed access to the coast. Parking costs can also be a significant barrier to such access, particularly for those least able to afford it and who are disproportionately burdened by such costs. We know that the County supports access for all, and we

would strongly recommend that the LUP include explicit requirements to not only retain existing free public parking as *free public* parking, but to also enhance free public parking opportunities, and seek to ensure that adequate such parking is provided at levels commensurate with expected need and use. If any fees are currently charged, they need to be the exception to the rule, and should be eliminated if possible, and otherwise be low enough to avoid adverse coastal access impacts, to include free and discounted provisions for all who need them, and to ensure that any revenues are directly targeted to improve the resource being accessed in the first place. We believe that these sorts of measures are required in order to maximize affordability and access opportunities for all residents and visitors to the coast, consistent with the mandates of the Coastal Act.

Finally, given the County's clear vision to create a continuous trail system for the California Coastal Trail (CCT), we strongly recommend that prescriptions and policies be provided that acknowledge and require the development of a viable off-road CCT through Sonoma County. In addition, the chapter should include provisions to help adapt the County's beaches, coastal accesses, trails, and other public access amenities to sea level rise.

Water Resources

On Water Resources, the chapter needs a better explanation of the primary sources of water for Sonoma County; whether there are issues regarding water supply, availability, and sustainability; and policies and provisions that address identified issues. In our experience these types of issues can be key LCP issues, and the LUP needs to provide explicit direction on how they are addressed in coastal zone permitting and planning contexts. We would be happy to provide examples of LCP policies that have proven useful in other jurisdictions in this regard.

Public Safety

We last provided feedback regarding the Public Safety policies of the draft LUP in a letter dated May 28, 2019, much of which will be reiterated. We previously emphasized that the Public Safety chapter needs to clearly explain how different hazard types and associated policies would apply, and to indicate that proposed development must be sited and designed to appropriately address and resolve coastal hazards and coastal hazards constraints to development over the short- and longer-term without reliance on shoreline armoring, and we continue to encourage this structure. Further, we'd note that this chapter uses three related terms to describe redevelopment: *redevelopment*, *coastal redevelopment*, and *blufftop redevelopment*, only the latter of which is defined within the Public Safety chapter itself. To avoid confusion regarding this term, we would strongly recommend using only one term (either "redevelopment" or "coastal redevelopment"), which would measure redevelopment cumulatively from the effective date of the Coastal Act (January 1, 1977). We would be happy to provide examples of policies that have worked in other LCP contexts if it would be useful to your efforts on these points.

Acceptable risk is also mentioned frequently in the document as a standard by which to

allow development, however, the “determination of acceptable risks” section does not specify that in order to be “acceptable,” the applicant is required to provide evidence that the development would not cause damage or substantial adverse impacts on coastal resources, as it does in policy C-PS-1e. We recommend that the County explicitly define this term as stated, or define what is *acceptable* under each of the varying scenarios rather than rely on this vague terminology. We also would recommend the County consider adding a policy that addresses the prospect of redevelopment in unique situations where properties cannot be adequately or safely setback or are already occupying lands in the public trust. Again, we can provide examples if useful.

In addition, other concerns on this chapter include: 1) policies that are requirements need to be stated as “shalls”, and not as “encourage” or “consider,” as the use of this type of terminology will make these policies not actionable; 2) policies need to better mirror Coastal Act language and required analyses regarding when shoreline armoring is permissible, and required mitigation for such devices if and when permitted; and 3) policy C-PS-13 references reconstruction of damaged structures above base flood elevation, which is problematic as the base flood elevation will continue to increase with sea level rise, and this policy does not take that into account. All of these need to be addressed in future iterations of the draft document.

Circulation and Transit

As you know, the coastal zone of the County includes an incredibly dynamic shoreline, much of which is served solely by Highway 1. Thus, circulation and transit along that corridor are incredibly important, both for residents and visitors. While the proposed updated LUP recognizes these issues, we believe it could be much stronger in terms of addressing the challenges thereto. Specifically, the Circulation and Transit chapter needs to include more discussion of sea level rise issues and adaptation measures, in particular in terms of options including living shorelines, roadway elevation, other softer shoreline solutions, monitoring coastal erosion to identify segments of Highway 1 that need to be realigned, provisions for when temporary armoring may be permitted, and how flooding from sea level rise may impact access amenities. Ideally, different prescriptions for different sections of coast would be provided. In addition, safety projects need to be more specifically defined, and policies related to safety improvements must be balanced with other resource constraints and protections as provided for in the Coastal Act and other sections of the LCP. Please ensure that the Caltrans maintenance guidelines are added to the LUP, and we would strongly suggest working directly with Caltrans on policies that affect their interests well in advance of finalizing the draft LUP.

In addition, we believe that the document's current vision for increasing and enhancing transit options to and along the coast can be enhanced with more prescriptive policies regarding establishing levels of transit by explicit benchmarks. This can help with the parking issues mentioned, and also obviously in terms of County and statewide goals when it comes to greenhouse gas emissions. Applicable development review policies are required to provide off-street parking, with some other more transit or bicycle and

pedestrian-focused policies. While such off-street parking is critical in the absence of adequate alternatives, like transit, for ensuring that on-street public parking is used for public purposes, and so that private development does not adversely impact public access, we would recommend an enhanced focus on requiring non-automobile options and alternatives, both in individual projects and more broadly, and to provide actionable policies and metrics to actually require such changes to be made in the context of coastal permitting and planning cases.


Cultural Resources

In terms of Cultural Resources, we encourage the County to reach out to the Tribes and Nations with ancestral ties to these lands and waters, if it has not already done so. These entities need to have an opportunity to look at the draft LUP document, especially chapter 10, before it is approved to ensure there are no adverse effects to their rights or resources (some of which may not be specifically outlined in treaties or other laws/regulations). In addition, the definition of "cultural resources" should clarify that "tribal cultural resources" can include (but are not limited to) viewscapes and living vegetation/species used for cultural practices and subsistence.

Policy C-CH-1a is a good policy regarding referring applications to the Northwest Information Center at Sonoma State, however, there should be a similar policy regarding notifying, referring, and consulting with known Tribes local to the area for any projects proposing new ground disturbance. Then, as to Policy C-CH-1f, it needs to be made clear that sampling and salvage must also be coordinated with the appropriate Native American representatives (those with ancestral ties to the area are preferable). Oftentimes these artifacts end up in museums rather than with the appropriate Tribe/Nation where they originated and with whom they belong. Therefore, there should be standards related to how the artifacts will be kept/taken care of, that should be devised in coordination with the appropriate Tribe/Nation.

In closing, we again thank you and your staff for the thoughtful and collaborative work to-date and appreciate and commend the County for moving forward with the difficult task of updating the LCP's LUP. We also very much look forward to further collaboration, and helping the County to refine the draft LUP, and a future draft IP, including in the ways identified in this letter. We hope these comments help move us forward to this end. If you have any questions or would like to discuss these matters further, please don't hesitate to contact me.

Sincerely,

DocuSigned by:

035096250A8E49E...

Stephanie Rexing
North Central Coast District Manager
California Coastal Commission